

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

In the Matter of)
)
Assessment and Collection of Regulatory Fees for) MD Docket No. 16-166
Fiscal Year 2016)

**COMMENTS OF FRONTIER COMMUNICATIONS
CORPORATION**

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I. INTRODUCTION AND SUMMARY.

Frontier Communications Corporation (“Frontier”) hereby submits comments to the Notice of Proposed Rulemaking in the above-referenced docket.¹ Specifically, Frontier requests that the Commission correct the long-time imbalance in regulatory fees faced by interstate telecommunications service providers (“ITSPs”) and their customers. No one disputes that ITSPs continue pay a disproportionate share of the Commission’s regulatory fees and that such unequal fees distort competition.

The Commission has several potential tools for correcting the disproportionate regulatory burden shouldered by ITSPs and their customers. For example, by treating wireless carriers as ITSPs, the Commission could ensure that all voice providers pay regulatory fees on a non-discriminatory basis. Alternatively, with the Commission’s decision to reclassify broadband Internet access service in the *Open Internet Order*,² the Commission could require all newly minted providers of interstate telecommunications service to share ITSP regulatory fees. Or, as an interim measure, rebalancing the full-time equivalents (“FTEs”) allocated to the Wireline

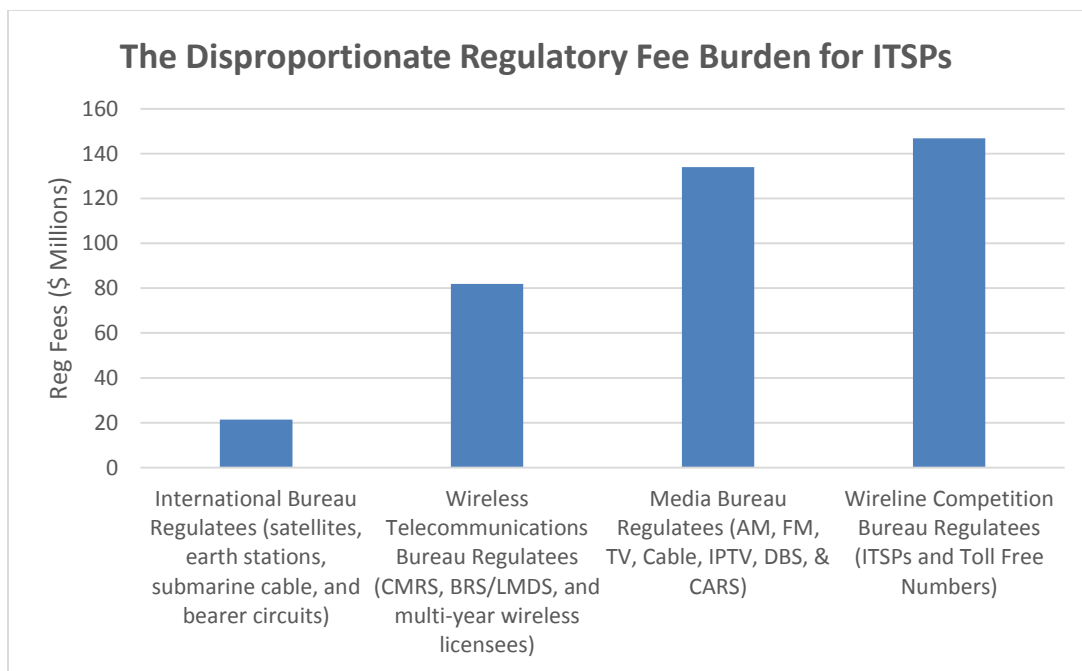
¹ *Assessment and Collection of Regulatory Fees for Fiscal Year 2016*, MD Docket No. 16-166, Notice of Proposed Rulemaking, FCC 16-61 (May 19, 2016) (“*NPRM*”).

² *Protecting and Promoting the Open Internet*, Report and Order on Remand, Declaratory Ruling, and Order, 30 FCC Rcd 5601 (2015) (“*Open Internet Order*”).

Competition Bureau (“Wireline Bureau”) would reduce some of the distortions under the current framework. Whatever solution the Commission chooses, it is past time for the Commission to rationalize the amount ITSPs pay in regulatory fees.

II. INTERSTATE TELECOMMUNICATIONS SERVICE PROVIDERS AND THEIR CUSTOMERS CONTINUE TO SHOULDER A DISPROPORTIONATE SHARE OF THE COMMISSION’S REGULATORY FEES.

ITSPs and their customers bear a disproportionate burden of regulatory fees, paying more than any other group of Commission regulatees, and this disparity continues to increase as ITSPs pay fees on a shrinking amount of revenue due to continued line loss:³



In its 2012 Report, GAO specifically highlighted this disparity between regulatory fees paid by wireless and wireline voice providers – a disparity that remains largely unaltered four years

³ See *NPRM* ¶ 6.

later.⁴ As GAO explained, “while the wireline telephone industry’s estimated revenues on which fees are assessed declined by 44 percent from fiscal year 1998 to fiscal year 2011, the percentage of total regulatory fees this industry is expected to pay declined by 4 percentage points, from 48 percent to 44 percent of total fees.”⁵ At the same time, “while the wireless telephone industry’s estimated number of subscribers grew 437 percent during this time period, the percentage of the total regulatory fees the cell phone industry is expected to pay grew only 5 percentage points—from 10 to 15 percent of the total regulatory fees.”⁶ These trends have only continued, with the Commission reporting that mobile voice subscriptions have increased from 297 million to 323 million (9%) from December 2011 to December 2014, and wireline voice subscriptions have fallen from 143 million to 127 million (11%) over the same time period, without a commensurate reduction in regulatory fees.⁷

As shown below, comparing the GAO’s chart showing the imbalanced regulatory fees in Fiscal Year (“FY”) 2011 data to an updated chart based on the Commission’s proposed regulatory fee schedule, it is remarkable how little has changed in ITSPs relative regulatory fee burden given the known disparity and continued line loss:

⁴ Government Accountability Office, *Federal Communications Commission Regulatory Fee Process Needs to be Updated*, GAO-12-686 (Aug. 2012), <http://www.gao.gov/products/GAO-12-686>.

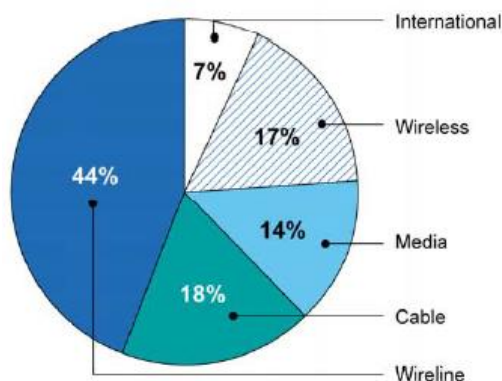
⁵ *Id.* at 12-13

⁶ *Id.*

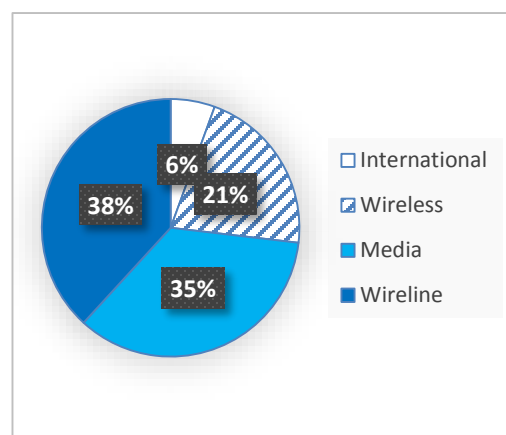
⁷ Wireline Competition Bureau, *Voice Telephone Services: Status as of December 31, 2014* (March 2016), <http://bit.ly/1rwe2uB>.

ITSPs Continue to Shoulder a Disproportionate Burden: GAO's 2012 Report vs. Today

FY 2011

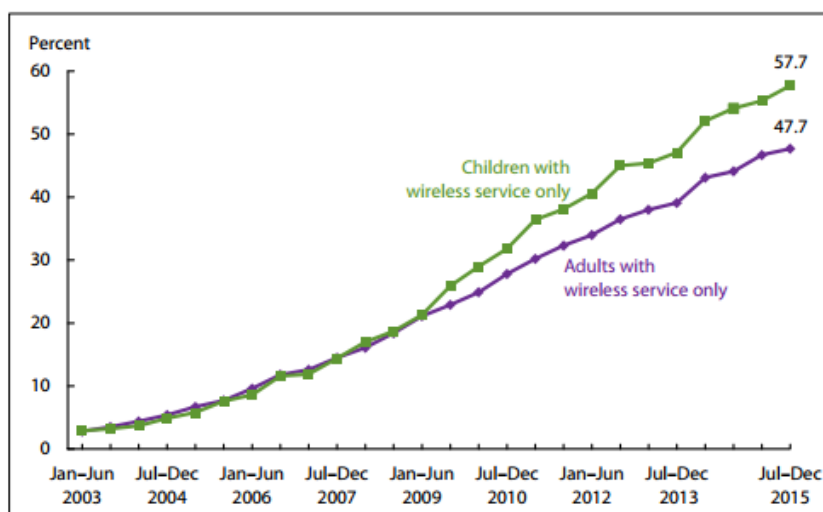


Proposed FY 2016



As shown at right, the effect of this imbalance is particularly apparent when compared with the growth of wireless only households, which continue to grow at a steady rate.⁸ Each remaining ITSP customer must effectively pay a higher regulatory fee with each passing year while at the same time, each wireless customer pays less and less.

Figure. Percentages of adults and children living in households with only wireless telephone service: United States, 2003–2015



NOTE: Adults are aged 18 and over; children are under age 18.
DATA SOURCE: NCHS, National Health Interview Survey.

⁸ CDC, *Wireless Substitution: Early Release of Estimates from the National Health Interview Survey, July—December 2015* (2016), <http://1.usa.gov/27e0RzD> (“CDC Wireless Substitution Report”).

Perhaps most problematically, the current disparity in the regulatory fees harms some of the consumers least able to afford additional fees on their home phone service. ITSP subscribers are disproportionately elderly. According to the CDC, the young are much more likely to abandon landline phone service while the elderly are overwhelmingly likely to still have landline service – the percentage of adults living with only wireless telephones generally decreases as age increases: 61.1% for those 18-24; 72.6% for those 25-29; 69.0% for those 30-34; 58.2% for those 35–44; 41.2% for those 45–64; and 20.5% for those 65 and over.⁹

While the Commission last year corrected the disparity faced by MVPD providers by adjusting the regulatory fees that DBS providers pay, it still has yet to act on the similar issue of the disproportionate burden faced by wireline voice providers. As Commissioner Pai explained with respect to DBS last year, and which applies with equal force here: “[i]ntermodal competitors face[] radically different fee requirements based on little more than historical accident,” which “violates the bedrock principle that similar services should be regulated similarly.”¹⁰ As he continued: “[m]ost fundamentally, our fee assessments didn’t reflect the advent of cross-platform convergence in the communications marketplace—that is, companies from formerly distinct niches competing to offer the same services—or the accompanying change to our substantive regulatory framework.”¹¹ It is time for the Commission to correct this imbalance.

⁹ *See id.* at 2.

¹⁰ Statement of Commissioner Ajit Pai, *Assessment and Collection of Regulatory Fees for Fiscal Year 2015*, Notice of Proposed Rulemaking, Report and Order, and Order, 30 FCC Rcd 5354 (2015).

¹¹ *Id.*

III. COMBINING WIRELESS AND WIRELINE VOICE IN THE ITSP CATEGORY WILL CORRECT THE LONG-TERM WIRELINE REGULATORY FEE IMBALANCE.

Recognizing this imbalance, the Commission has previously sought comment on combining wireless providers into the ITSP fee category so that all voice providers pay regulatory fees on the same basis.¹² As the Commission explained at that time, “because wireless services are comparable to wireline services, both services encompass similar regulatory policies and programs, such as universal service and number portability.”¹³ Indeed, those similarities are not limited only to universal service and number portability, but rather they pervade the work of the wireline bureau, including issues such as net neutrality, privacy, intercarrier compensation, rural call completion, special access, 911, and pole attachments.

As shown in the attached Appendix, even a cursory review of the public-facing websites of the respective divisions of the Wireline Competition Bureau shows that the work of these divisions is inseparable from wireless carriers, with each division working significantly for the benefit of and in relation to all telecommunications service providers. To take just one particularly salient example, the Pricing Policy Division’s current focus on the special access rulemaking and the tariff investigation is, according to the Commission’s own statements, deeply interrelated with wireless deployment and the prices wireless carriers pay for backhaul. Meanwhile, the same cursory review of the public-facing websites of the divisions of the

¹² See, e.g., *In the Matter of Assessment and Collection of Regulatory Fees for Fiscal Year 2014; Assessment and Collection of Regulatory Fees for Fiscal Year 2013; Procedures for Assessment and Collection of Regulatory Fees*, Notice of Proposed Rulemaking, Second Further Notice of Proposed Rulemaking, and Order, 29 FCC Rcd 6417 ¶¶ 36-40 (June 13, 2014) (“FY 2014 NPRM”).

¹³ *Id.* ¶ 36 (citing *Procedures for Assessment and Collection of Regulatory Fees; Assessment and Collection of Regulatory Fees for Fiscal Year 2013*, Notice of Proposed Rulemaking and Further Notice of Proposed Rulemaking, 28 FCC Rcd 7790 ¶ 12 (2013) (“FY 2013 NPRM”)).

Wireless Telecommunications Bureau shows that those divisions, understandably, are focused only on wireless carriers and do not handle issues related to wireline carriers.¹⁴ While the public websites of the Wireless and Wireline Bureau are not an official measure of the time FCC employees devote to particular issues (which, of course, would be impossible for the public to determine),¹⁵ this review illustrates the current regulatory fee imbalance and the need for the Commission to correct it.

Unfortunately, the *NPRM* recommends, at least for now, rejecting the proposal to combine wireless voice and wireline voice into the ITSP category. Specifically, the Commission explains that its “analysis of the Wireline Competition Bureau FTE work on wireline issues that also affect the CMRS industry does not support adopting a new subcategory for CMRS in the ITSP regulatory fee category—and thus assessing regulatory fees on CMRS based on both Wireless Telecommunications Bureau FTEs and Wireline Competition Bureau FTEs.”¹⁶ While this conclusion may or may not be correct, it is impossible for the public to evaluate its merits without further access to the Commission’s detailed analysis of this issue. At a minimum, the Commission should indicate the Wireline Bureau FTEs devoted to net neutrality, privacy, intercarrier compensation, rural call completion, special access, pole attachments, universal

¹⁴ See Appendix A, attached.

¹⁵ See *GAO’s 2012 Regulatory Fee Report* (“[The] FCC’s regulatory fee process also lacks transparency because of the limited nature of the information FCC has published on it. This has made it difficult for industry and other stakeholders to understand and provide input on fee assessments.”).

¹⁶ *NPRM* ¶ 18. The Commission indicates that “ITTA’s proposal to combine these regulatory fee categories does not appear to address the substantial differences between the services in terms of regulatory oversight by the two bureaus.” *NPRM* ¶ 18. This statement may be true for the Wireless Bureau, which manages issues primarily or solely for the benefit or related to wireless regulatees, but as shown in, for example, Appendix A, the Wireline Bureau undertakes extensive activities that benefit both ITSPs and CMRS providers.

service, numbering, 911 and any other wireless/wireline issues and describe why these FTEs are not working to benefit wireless carriers. Without this type of additional information, the process as to wireline ITSPs continues to lack transparency, as criticized in GAO’s 2012 report.¹⁷

Of course, with such an imbalance in regulatory fees, basic principles of regulatory parity and fairness counsel Commission action, and, indeed, the underlying regulatory fee statute, 47 U.S.C. § 159, supports such action. In particular, Section 159 requires that regulatory fees be “adjusted to take into account factors that are reasonably related to the benefits provided to the payor of the fee by the Commission’s activities.”¹⁸ As ITTA has explained “there is clear precedent for the Commission to combine wireless providers into the ITSP regulatory fee category, similar to how the Commission combined interconnected VoIP providers, and more recently, DBS providers, into existing fee categories in recognition of the work performed by the relevant core bureaus overseeing such entities.”¹⁹ Rather than asking Wireline Bureau employees to track time or classify their activities based on artificial regulatory silos, combining wireless voice and wireline services in the ITSP category would recognize technological convergence and rationalize the regulatory fee system.

¹⁷ See *GAO 2012 Regulatory Fee Report*.

¹⁸ 47 U.S.C. § 159.

¹⁹ See Comments of ITTA – The Voice of Mid-Size Communications Companies, MD Docket No. 15-121 (Nov. 9, 2015); see also *Assessment and Collection of Regulatory Fees for Fiscal Year 2007*, MD Docket No. 07-81, Report and Order and Further Notice of Proposed Rulemaking, FCC 07-140, ¶¶ 11-20 (2007) (“FY 2007 R&O”); *Assessment and Collection of Regulatory Fees for Fiscal Year 2015; Amendment of Part 1 of the Commission’s Rules; Assessment and Collection of Regulatory Fees for Fiscal Year 2014*, Notice of Proposed Rulemaking, Report and Order, and Order, 30 FCC Rcd 5354 ¶¶ 28-41 (2015).

IV. INCLUDING ALL PROVIDERS OF INTERSTATE TELECOMMUNICATIONS SERVICE IN THAT REGULATORY FEE CATEGORY COULD ALSO CORRECT THE DISPROPORTIONATE BURDEN ON ITSPS.

With reclassification of broadband Internet access service as a telecommunications service,²⁰ more than just the current class of “Interstate Telecommunications Service Providers” actually provide interstate telecommunications services. In the *Open Internet Order*, however, the Commission specifically forebore from any associated effect Title II reclassification would have on regulatory fee obligations.²¹ The Commission has the opportunity here to revisit that decision. As the Commission explains, it “may add, delete, or reclassify services in the fee schedule to reflect additions, deletions, or changes in the nature of its services as a consequence of Commission rulemaking proceedings or changes in law.”²² Requiring all interstate telecommunications service providers to pay ITSP regulatory fees, not just the current artificially small subset of providers, could correct the current imbalanced regime and rationalize the regulatory fee framework.

V. ALTERNATIVELY, IN THE INTERIM, UPDATING THE NUMBER OF FULL-TIME EQUIVALENTS ASSOCIATED WITH THE WIRELINE COMPETITION BUREAU COULD LESSEN THE DEGREE OF DISPARITY FACED BY ITSPS AND THEIR CUSTOMERS.

While the Commission tentatively concludes that it should not reassign “Wireline Competition Bureau FTEs to the Wireless Telecommunications Bureau,”²³ it “nevertheless

²⁰ See *Open Internet Order*.

²¹ See *id.* ¶ 529 and n.1633 (“[T]he classification of broadband Internet access service as a telecommunications service could trigger certain contributions to support mechanisms or fee payment requirements under the Act and Commission rules, including some beyond those encompassed by the categories above. Insofar as any provisions or regulations not already covered above would immediately require the payment of contributions or fees by virtue of the classification of broadband Internet access service (rather than merely providing Commission authority to assess such contributions or fees) they are included within the scope of our forbearance.”).

seek[s] comment on whether it would be appropriate to allocate some proportion of the direct FTEs that devote time to universal service and/or numbering issues as additional indirect FTEs.”²⁴ If the Commission decides that it will not include wireless providers in the ITSP category and that it will not reassign certain Wireline Bureau FTEs to the Wireless Bureau, it should at a minimum reassign all Wireline Bureau FTEs that work on cross-jurisdictional issues to indirect FTEs. In addition to universal service and numbering FTEs, this would include FTEs devoted to net neutrality, privacy, intercarrier compensation, rural call completion, special access, 911, and pole attachments, among other issues.

As to the specific FTEs the Commission seeks comment on here, the Commission should allocate all of these FTEs as indirect. In particular, the Commission explains that “approximately seven FTEs work on numbering issues and 52 FTEs work on universal service issues (approximately 16 on the high-cost program, 13 on the schools and libraries program, nine on the Lifeline program for low income consumers, seven on the rural healthcare program, and seven on universal service contributions).”²⁵ First and foremost, all universal service programs are programs that benefit the public, not specifically or uniquely wireline companies. Many types of carriers, including wireless carriers, pay into the Universal Service Fund – those same carriers should likewise have to pay for associated Universal Service program regulatory fees. This could be achieved by making Universal Service Fund FTEs indirect, or alternatively by requiring carriers to pay regulatory fees for these FTEs based on their pro rata share of USF contributions. Even if the Commission were to look at the carriers most affected by these

²² *NPRM* ¶ 4

²³ *Id.* ¶ 17.

²⁴ *Id.* ¶ 19.

²⁵ *Id.*

programs designed to benefit the public – not that this review is appropriate or necessary – each and every one of these programs benefits wireless companies (and satellite and cable companies, as well as other Commission regulatees). In the case of Lifeline for instance, 85% of disbursements are to wireless companies, yet ITSPs continue to shoulder the full burden of the regulatory fees for these employees.²⁶ So too for FTEs that work on numbering issues – wireless connections, for example, make up over 70% of all retail telephone connections.²⁷

Finally, the Commission need not wait to achieve perfection to begin correcting the unfair regulatory fee burden placed on ITSPs and their customers. A clear case for action already exists, whether it is combining wireless and wireline providers in the ITSP category, requiring all providers of interstate telecommunications services to pay as ITSPs, or adjusting FTEs. In the *NPRM*, the Commission indicates that “[g]iven the significant implications of reassignment of FTEs in our fee calculation, we make changes to FTE classifications only after performing considerable analysis and finding the clearest case for reassignment.”²⁸ This restatement of the Commission’s standard for adjustment actually slightly flips the burden for reassigning FTEs, suggesting that the Commission only reassigns FTEs in the clearest cases. In fact, the Commission in the *FY 2013 Order* was actually describing that there was no need to wait to reassign FTEs “until [it had] reexamined the allocation of FTEs throughout the Commission.”²⁹ Rather, the Commission explained that “it is reasonable and consistent with

²⁶ See USAC, *Low Income Support Mechanism: Wireless Disbursements as a Percentage of Total Disbursements* (2014), <http://bit.ly/1Y2VPn8>.

²⁷ Wireline Competition Bureau, *Voice Telephone Services: Status as of December 31, 2014* at 2 (March 2016), <http://bit.ly/1rwe2uB>.

²⁸ *NPRM* ¶ 18 (citing *Assessment and Collection of Regulatory Fees for Fiscal Year 2013*, Report and Order, 28 FCC Rcd 12351, ¶ 19 (2013) (“*FY 2013 Order*”).

²⁹ *Id.* ¶ 19.

section 9 of the Act to readjust the assignment of FTEs in the bureau where the record demonstrates the clearest case for reassignment.”³⁰ Just like the clear case for reassignment of International Bureau FTEs in 2013, the clear disparity in ITSP regulatory fees and the misallocation of wireline FTEs allows the Commission to act to correct the situation immediately.

VI. CONCLUSION

It is beyond time for the FCC to address the disproportionate regulatory fee burden experienced by ITSPs and their customers in a meaningful way. With the continued loss of wireline voice customers, this regulatory fee disparity only continues to grow. Including wireless voice providers in the ITSP category would reduce this disparity. Alternatively, the Commission could consider requiring all providers of interstate telecommunications service to contribute to the ITSP regulatory fee category. If the Commission is unable to take these steps immediately, it should at a minimum reassign the Wireline Bureau FTEs who work for the benefit of other regulated entities.

Respectfully submitted,

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³⁰ *Id.*

Appendix A:

The Wireline Competition Bureau's Cross-Functional Roles vs. the Wireless Bureau's Focus on Only Wireless Issues

The following are the descriptions of the roles of each of the divisions of the Wireline Competition Bureau and Wireless Telecommunications Bureau that appear on the public-facing websites. While far from an official survey of the respective Bureaus' work, which would be impossible for the public to conduct, the following review illustrates that each of the divisions of the Wireline Competition Bureau are deeply involved for the benefit of wireless providers while each division of the Wireless Telecommunications Bureau is focused almost solely on the benefit of wireless regulatees. We have **bolded and underlined** the respective portions of each Division's mission that have a cross-functional wireline and wireless purpose and benefit.

Wireline Competition Bureau

- **Telecommunications Access Policy Division**
 - Our primary mission is to **advance the goals of universal service** — that all Americans have **access to robust, affordable broadband and voice services**. Consistent with our mission, the Division is responsible for developing **policies for administration and oversight of the federal Universal Service Fund**, which is comprised of programs designed to ensure access to affordable communications for **schools, libraries, health care providers, and rural and low-income consumers**. We also develop policies for administration and oversight of the **contribution system**, which is the system by which the Commission's federal universal service programs are funded. In coordination with the Wireline Competition Bureau's Pricing Policy Division, we also issue and recommend interpretations of the FCC's **Jurisdictional Separations** procedures.
<https://www.fcc.gov/general/telecommunications-access-policy-division>
- **Pricing Policy Division.**
 - The Pricing Policy Division is responsible for administering the provisions of the Communications Act requiring that **the charges, practices, classifications, and regulations of common carriers providing interstate and foreign telecommunications services are just and reasonable**. The Division develops **competitive pricing policies and rules for the retail and wholesale interstate rates** charged by price-cap carriers and rate-of-return carriers; the **intercarrier compensation** rates that carriers charge each other; and the rates or rate methodologies for resale of local exchange services, **unbundled network elements** and **interconnection** that incumbent carriers charge competitive carriers. The Division also ensures compliance with Commission **pricing rules and conducts formal or informal investigations of carrier charges, practices, classifications and regulations**, and recommends appropriate action. The Division also develops rules and policies relating to the Uniform System of

Accounts, affiliate transactions, regulated/non-regulated cost allocations, and depreciation rates. The Division is responsible for the **Commission's jurisdictional separations procedures**, including supporting the Commission's role in the Federal-State Joint Board on Separations.

<https://www.fcc.gov/general/pricing-policy-division>

- **Competition Policy Division**

- Our primary mission is to foster competition in the provision of communications services through market-opening rulemaking and other proceedings that affect wireline telecommunications service providers and consumers. The division is responsible for implementation of non-pricing aspects of the local competition requirements of the Telecommunications Act of 1996, including **interconnection, network element unbundling and privacy**. The division also administers U.S. **numbering policy (including local number portability)**, and reviews applications from wireline carriers for mergers and other transfers of control, and discontinuance of service.

<https://www.fcc.gov/general/competition-policy-division-wireline-competition-bureau>

- **Industry Analysis and Technology Division, Wireline Competition Bureau**

The Industry Analysis and Technology Division (IATD) conducts economic, financial, and statistical analyses of the wireline telecommunications industry to support the work of the Commission.

IATD collects and/or manages the following industry data:

FCC Form 477 data on broadband deployment and local telephone competition

Study area boundary data

Urban rate survey data

ARMIS (Automated Reporting Management Information System) data

Telephone numbering (NRUF) data

FCC Form 499 data on telecommunications provider revenue

<https://www.fcc.gov/wireline-competition/general/industry-analysis-and-technology-division-wireline-competition-bureau>

Wireless Bureau Divisions

- **Broadband Division.** “The Broadband Division is responsible for developing policy and rules that facilitate rapid, widespread deployment of wireless communications services, particularly wireless broadband services. Along with the Mobility Division, it oversees nearly two million wireless licenses. The Broadband Division helps carry out the Wireless Bureau's mission by developing and administering the rules and regulations for services including Advanced Wireless Service (AWS), 600 MHz, Broadband Radio

Service (BRS), Educational Broadband Service (EBS), wireless backhaul, and broadcast auxiliary services such as wireless microphones.”

<https://www.fcc.gov/general/broadband-division-wireless-telecommunications-bureau>

- **Auctions and Spectrum Access Division.** The Auctions and Spectrum Access Division (Auctions Division) is responsible for implementing the FCC’s competitive bidding authority through a fair and transparent auction process. The Auctions Division helps carry out the Wireless Bureau’s mission by planning, designing, and conducting all auctions at the FCC, including spectrum auctions for wireless broadband such as 700 MHz and Advanced Wireless Service (AWS), to paging services, to over-the-air television and radio. The Auctions Division also works on other competitive bidding issues such as transitioning spectrum for new uses (relocation and re-banding or re-purposing) and reverse auctions to distribute funds for universal service support. The Auctions Division reviews and processes applications filed through the Integrated Spectrum Auction System (ISAS). <https://www.fcc.gov/general/auctions-spectrum-access-division-wireless-telecommunications-bureau>
- **Competition & Infrastructure Policy Division.** In helping to carry out the Wireless Bureau’s mission, the Competition & Infrastructure Policy Division (CIPD) develops and implements competition and infrastructure policies to promote the rapid deployment of wireless communications services consistent with environmental and other statutory requirements and to encourage competition in the wireless marketplace for the benefit of consumers.

CIPD’s competition group reviews proposed transactions involving mobile wireless licensees, and establishes rules to promote competition in the wireless marketplace, such as spectrum reserve and joint bidding rules for the Broadcast Incentive Auction. It manages several consumer-oriented policies including the promotion of wireless roaming, which allows consumers to automatically receive mobile service when outside of the provider’s coverage area; hearing aid compatibility for wireless handsets, which ensures providers and device manufacturers offer handsets that are compatible with hearing aids; and wireless issues in the Open Internet proceeding. CIPD also analyzes data and trends in the wireless marketplace, including the preparation of the Annual Mobile Wireless Competition Report, engagement on the FCC’s Measuring Broadband America initiative, and assessment of mobile broadband deployment.

CIPD’s infrastructure group manages environmental compliance for licensees and tower registrants so that the agency meets its obligations under the National Environmental Policy Act and the National Historic Preservation Act. In doing so, it evaluates tower siting (including new tower constructions and antenna collocations), conducts rulemakings, and oversees antenna structure registration, marking, and lighting compliance. CIPD works closely with tribal governments and State historic preservation officers, as well as other federal agencies, to coordinate on tower siting.

<https://www.fcc.gov/general/competition-infrastructure-policy-division-wireless-telecommunications-bureau>

- **Mobility Division.** The Mobility Division is responsible for developing policy and rules that facilitate rapid, widespread deployment of wireless communications services. Along with the Broadband Division, it oversees nearly two million licenses used to provide an array of wireless services. The Mobility Division helps carry out the Wireless Bureau's mission by administering the rules and regulations for spectrum licenses ranging from wireless broadband such as 700 MHz , Cellular, and Broadband PCS, to private land mobile used for dispatch and remote monitoring of equipment, to maritime and aviation, to personal use such as Ham Radio. The Mobility Division reviews and processes license applications filed through the Universal Licensing System (ULS) for the services listed below. <https://www.fcc.gov/general/mobility-division-wireless-telecommunications-bureau>.
- **Technologies, Systems and Innovation Division.** The Technologies, Systems and Innovation Division (Technology Division) is responsible for developing and managing the Wireless Bureau's information technology (IT) tools, systems and programs. The Technology Division helps carry out the Wireless Bureau's mission by developing agile and user-friendly electronic systems and tools, making wireless data available and easy to understand, and creating clear concise web content. The Technology Division oversees systems such as the Universal Licensing System (ULS), the Antenna Structure Registration System (ASR), and the Spectrum Dashboard. The Technology Division also oversees the Wireless Bureau's web presence and the Universal Licensing System (ULS) customer support center. <https://www.fcc.gov/general/technologies-systems-and-innovation-division-wireless-telecommunications-bureau>